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Healthcare

Mallinckrodt

Superfund F
SITE: Wells G & H
OTHER: 283 404

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September 29, 2005

VIA FACSIMILE & U.S. MAIL

Ms. Martha Bosworth, Enforcement Coordinator
U.S. Environmental Protection Agency
Office of Site Remediation and Restoration (HBS)
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

ATTN: Wells G & H Case Team

Re: Supplemental Request for Information Pursuant to Section 104 of CERCLA in relation to the former Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, Massachusetts, hereinafter referred to as the "Site".

Dear Ms. Bosworth:

This response is being made on behalf of Mallinckrodt Inc., a New York Corporation ("Mallinckrodt" or "Respondent") to the supplemental request for information made by Bruce Marshall of the U.S. Environmental Protection Agency ("EPA"). EPA issued the supplemental request to Mallinckrodt on August 16, 2005 pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") and Mallinckrodt received this request on August 22, 2005. As previously stated in the initial response of March 31, 2004, Mallinckrodt is successor-in-interest to International Minerals & Chemical Corporation ("IMC") which acquired Kingston Steel Drum (KSD) through the acquisition of Great Lakes Container Corporation. Mallinckrodt's response in connection with KSD is limited to the time periods from May 4, 1973 until May 31, 1976 when it was owned and operated by Mallinckrodt's predecessor. Respondent does not maintain any records related to the KSD site or the former Great Lakes Container Corporation Division in its ordinary course of business. There are no current employees of Respondent who have any direct knowledge about the KSD site or the former Great Lakes Container Corporation division of IMC.

Information Concerning the Sale of the Great Lakes Container Division

1. A review of the previously provided Agreement of Purchase and Sale does not provide for any environmental liabilities which were specifically retained or assumed by either party in connection with the sale of the Great Lakes Container Division of IMC.
2. No current relationship exists between Respondent and The Great Lakes Container Corporation, owned and operated by Irving A. Rubin.
3. As stated above, Respondent did not have a business relationship with Great Lakes Container, owned and operated by Irving A. Rubin, after the sale in 1976 and has no knowledge about the operations at the KSD facility after that date. The previously provided documents in response to the initial request for information of March 31, 2004 marked as exhibit(s) D, E & F were obtained in connection with the various lawsuits related to the remediation of the former Great Lakes Container Corporation Division of IMC.

Information Concerning Respondent's Association with Whitney Barrel

- 1a-i. As previously stated in the response to the initial request for information, Respondent states that it does not have any records or information which reflects that any sites owned or operated by Respondent between May 4, 1973 and May 31, 1976 ever did business with Whitney Barrel. Furthermore, numerous historical files related to the KSD site as well as the Great Lakes Container Corporation division were reviewed to prepare the March 31, 2004 response to EPA's initial Information Request. No contracts, invoices, purchase orders, or other similar records were found that referenced Whitney Barrel during the timeframe that Respondent owned or operated the KSD site. To Respondent's knowledge, based on the record review completed, there was no relationship of any kind between the KSD site and Whitney Barrel or between Great Lakes Container Corporation and Whitney Barrel from May 4, 1973 and May 31, 1976.
2. See response to 1a-i above.

Information Concerning Respondent's Association with any other Drum Reconditioning and/or Recycling Companies

1. Respondent did not find any documents responsive to this request. To Respondent's knowledge, it has no information in its possession with regard to sending, receiving, or trading containers with any other drum reconditioning/recycling company during Respondent's operations at the

site between 1973 and 1976. Specifically, Respondent has no knowledge of sending, receiving or trading containers with Edward C. Whitney & Son, Inc., (a/k/a E.C. Whitney), Kingsland Drum Company, Roche Brothers Barrel & Drum Co., Roy Brothers, Inc., Ryan Barrel Company or Woburn Barrel during Respondent's operations at the site between 1973 and 1976.

2a-h. See response to 1 above.

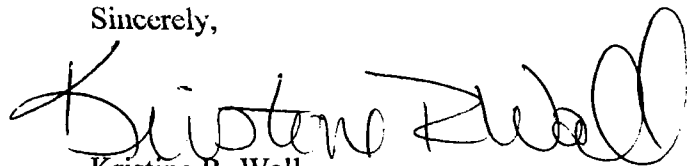
Compliance with this Request

1a-i. Respondent states that its review of records has been limited to those now in its possession and control. Respondent has in its possession at the address listed above legal files and documents primarily related to the pleadings/correspondence for U.S. v. Ottati & Goss, as well as corporate documents maintained in the ordinary course of business relating to the former Great Lakes Container Corporation division of IMC.

As stated previously, Respondent has responded to this request by review of documents maintained in historical files. Any information Respondent has was obtained through various lawsuits in connection with the former Great Lakes Container Corporation Division of IMC and was maintained for reasons related to litigation matters. Respondent does not maintain any records related to the operations of the KSD site or the former Great Lakes Container Corporation Division in its ordinary course of business. There are no current employees of Respondent who have any direct knowledge about the KSD site or the former Great Lakes Container Corporation division of IMC. Respondent has made a diligent review of these records and believes the foregoing is complete, true and correct to the best of its knowledge.

Respondent reserves the right to supplement this Information Request if further responsive information is identified.

Sincerely,



Kristine R. Wall
Senior Paralegal

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